

January 23, 2015

Deborah Jordan
Director, Air Division
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105



Tesoro Logistics Operations LLC
19100 Ridgewood Parkway
San Antonio, TX 78259
210 626 6000 Phone

**Re: 40 CFR Part 63, Subpart BBBBBB
Semiannual Compliance, Excess Emissions, and Malfunction Reports
Tesoro Logistics Operations LLC - Stockton, CA Terminal**

Dear Ms. Jordan:

Tesoro Logistics Operations LLC (TLO) submits the following attached semiannual reports pursuant to 40 CFR 63, Subpart BBBBBB (6B) – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities for the Stockton, California Terminal (Stockton Terminal):

1. Semiannual Compliance Report pursuant to 40 CFR 63.11095(a)
2. Excess Emission Report pursuant to 40 CFR 63.11095(b)
3. Malfunction Report pursuant to 40 CFR 63.11095(d)
4. Summary Report pursuant to 40 CFR 63, Subpart BBBBBB, Table 3

Should you need any additional technical information regarding this submission, please contact Mr. Steve Comley at stephen.d.comley@tsocorp.com or (562) 728-2265.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Walker", is written over a horizontal line.

John Walker
Manager, Terminals, NW
Tesoro Logistics Operations LLC

cc: San Joaquin Valley APCD
4800 Enterprise Way
Modesto, CA 95356

S. Comley: Tesoro Logistics Operations LLC (Long Beach, CA)

Enclosures

Responsible Official Certification:

I, being the Responsible Official, hereby affirm that, based on information and belief formed after reasonable inquiry, the statements made in these reports are true, accurate and complete to the best of my knowledge.

Name: Mr. Chris Maudlin

Title: Vice President, West Coast Logistics Operations

Signature: Ch. Maudlin

Date of Responsible Official Signature: 1 / 27 / 2015

Date of Report: January 27, 2015

Report Description: 40 CFR Part 63, Subpart BBBBBB Semiannual Report

1. Semiannual Compliance Report

Please find below the information covering the semiannual reporting period mandated for inclusion in the Semiannual Compliance Report pursuant to 40 CFR 63.11095(a).

§63.11095(a)(1). Storage Vessels

§63.11095(a)(1) requires reporting of “information specified in §60.115b(a), §60.115b(b), and §60.115b(c)” depending upon the control equipment installed. Tesoro conducted routine in-service tank inspections and maintained a record of each inspection performed as required by §60.113b and §60.115b. No conditions requiring reporting described in §60.115b(a) or §60.115b(b) were detected during these inspections over the course of the reporting period. During the reporting period, each gasoline storage tank at the Stockton Terminal complied with either §63.11087(a), Table 1, Option 2(b) for internal floating roof tanks or §63.11087(a), Table 1, Option 2(c) for external floating roof tanks, or §63.11087(f) for tanks currently subject to NSPS Kb, as appropriate.

§63.11095(a)(2). Loading Racks

No gasoline cargo tank loading events occurred for which vapor tightness documentation had not been previously obtained.

§63.11095(a)(3). Equipment Leak Inspections

All equipment leaks were repaired within 15 days after detection.

§63.11095(a)(4). Storage Vessels complying with §63.11087(b) after January 10, 2011

No new storage vessels are complying with §63.11087(b). Therefore, no reporting is required for §63.11095(a)(4).

2. Excess Emissions Report

Please find below the information covering the semiannual reporting period mandated for inclusion in the Excess Emissions Report pursuant to 40 CFR 63.11095(b). The Stockton Terminal is not classified as a bulk gasoline plant or a pipeline pumping station and therefore §63.11095(c) does not apply.

§63.11095(b)(1) & (2). Non-Vapor-Tight Gasoline Cargo Tank Loading & Reloading

No excess emissions events described in §63.11095(b)(1) or (2) occurred.

§63.11095(b)(3). Exceedance or Failure to Monitor

§63.11095(b)(3) is not applicable.

§63.11095(b)(4). Malfunctions under §63.11092(b)(1)(i)(B)(2) & (b)(1)(iii)(B)(2)

§63.11095(b)(4) is not applicable.

§63.11095(b)(5). Equipment Leaks

There were no occurrences of equipment leaks for which no repair attempt was made within five days or for which repair was not completed within 15 days of detection.

3. Malfunction Report

The Stockton Terminal did not experience any malfunctions requiring reporting under §63.11095(d).

4. Summary Report – Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance

Please find below the information mandated for inclusion in the Summary Report pursuant to 40 CFR 63 Subpart BBBBBB, Table 3, which references 40 CFR 63.10(e)(3).

Company:	Tesoro Logistics Operations LLC
Address:	3003 Navy Drive, Stockton, CA 95206
Pollutant:	VOC from gasoline and their speciated components
Reporting Period Dates:	July 1, 2014 – December 31, 2014
Description of Process Units:	Gasoline loading racks with associated carbon adsorption unit
Emission Limitation:	80 mg TOC/L gasoline loaded
Monitor Manufacturer & Model #:	Summit Non-Methane Gas Analyzer. (Model # IR-8400D)
Date of Latest CMS Certification or Audit:	CEM calibration checks are scheduled daily.
Total Operating Time of Affected Source:	4,372 hours

Emission Data Summary [40 CFR 63.10(e)(3)(vi)(I)]	CMS Performance Summary [40 CFR 63.10(e)(3)(vi)(J)]
1. Duration of excess emissions, exceedance, or excursion in reporting period due to: a. Startup/shutdown (in hours) <u>0</u> b. Control equipment problems (in hours) <u>0</u> c. Process problems (in hours) <u>0</u> d. Other known causes (in hours) <u>0</u> e. Unknown causes (in hours) <u>0</u> 2. Total duration, or number of excess emission, exceedance or excursion (in hours) <u>0</u> 3. Total duration or number ^{1, 2} (from 2 above) x (100) [Total source operating time] <u>0</u> %	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions (in hours) <u>0</u> b. Non-Monitor equipment malfunctions (in hours) <u>0</u> c. Quality assurance calibration (in hours) <u>33.4</u> d. Other known causes (in hours) <u>0</u> e. Unknown causes (in hours) <u>0</u> 2. Total CMS Downtime (in hours) <u>33.4</u> 3. $\frac{[\text{Total CMS Downtime}] \times (100)}{[\text{Total source operating time}]}$ <u>0.76\%</u>

Description of Changes to CMS, Processes, or Controls: No changes were made during the reporting period.
[40 CFR 63.10(e)(3)(vi)(K)]

¹ If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is <1%, and the CMS downtime for the reporting period is less than 5% of the total operating time for the reporting period, only the Summary Report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the administrator. [40 CFR 63.10(e)(3)(vii)]

² If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted. [40 CFR 63.10(e)(3)(viii)]